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December 21, 2020

VIA ECF FILING

Honorable Gary R. Brown
United States District Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Greengus v. Long Beach CSD, et al.*
Docket No.: 16 CV 01955 (GRB)(AYS)
L.G., et al v. Long Beach CSD, et al.
Docket No.: 17 CV 00453 (GRB)(AYS)

Dear Judge Brown:

My office represents the *Greengus* Plaintiffs in one of the above referenced cases. These matters were previously deemed related and consolidated for discovery purposes.

The parties have completed fact discovery, having taken eleven (11) depositions in the past 3 ½ months.

The Plaintiffs in both actions have hired a liability expert and damages' experts. Since this matter involves severely disabled, non-verbal autistic students who attended the Long Beach Middle School during a particular time period, the damages' experts will need to personally examine them. Dates have been set up for these examinations.

Additionally, in order for the liability expert to render his opinions and conclusions, he requires the review of certain depositions transcripts, some of which we have not yet gotten from the court reporting company.

Thus, the Plaintiffs respectfully request until February 15, 2021 to serve expert disclosures. The Defendants respectfully request until April 15, 2021 to serve rebuttal expert disclosures.

This is the fifth request for an extension of time to complete discovery and all parties consent to the granting of this application.

Thank you for your consideration of this matter.

Respectfully yours,

Justin M. Reilly

cc: Via ECF and Email

All Counsel